

**UNITED STATES DISTRICT COURT**  
WESTERN DISTRICT OF TEXAS, DEL RIO DIVISION

United States of America

vs.

(1) Naeim Rabi-Varzali

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§  
§  
§  
§

CRIMINAL COMPLAINT

CASE NUMBER: DR:23-M -00607(1)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about **February 12, 2023** in **Maverick** county, in the **WESTERN DISTRICT OF TEXAS** defendant(s) did, intentionally and knowingly failed to enter the United States at a designated border crossing point and did not report said arrival and present himself and all articles in his possession for inspection, to wit: a misdemeanor

in violation of Title

**19**

United States Code, Section(s)

**1459(a)**

I further state that I am a(n) \_ and that this complaint is based on the following facts: "On February 12, 2023, defendant, Naeim Rabi Varzali, an Iranian National, entered the United States illegally by wading across the Rio Grande River from Mexico to Eagle Pass, Texas and failed to report to immigration officials at an official Port of Entry to avoid scrutiny by officers at the Port of Entry. Defendant was apprehended shortly after crossing the Rio Grande River and provided a sworn statement to Immigration Officials in which

**Continued on the attached sheet and made a part of hereof.**

Sworn to before me and subscribed in my presence,

/s/ PENA, LUIS A.

Signature of Complainant

PENA, LUIS A.

02/21/2023

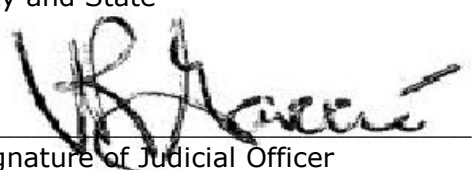
File Date

at DEL RIO, Texas

City and State

VICTOR ROBERTO GARCIA

UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer

**WESTERN DISTRICT OF TEXAS**

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**Continuation of Statement of Facts:**

he admitted that he entered the United States illegally. Subject was apprehended in Eagle Pass, Texas located in the Western District of Texas."



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Signature of Judicial Officer

\_\_\_\_\_  
/s/ PENA, LUIS A.

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Signature of Complainant